

# **EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

<p>WORLDS, INC.,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>ACTIVISION BLIZZARD, INC., BLIZZARD ENTERTAINMENT, INC., and ACTIVISION PUBLISHING, INC.,</p> <p style="text-align: center;">Defendants.</p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>Civil Action No. 1:12-CV-10576 (DJC)</p> <p>JURY TRIAL DEMANDED</p>
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**NOTICE OF DEFENDANTS' NARROWED LIST OF PRIOR ART**

Pursuant to the Court's scheduling order (Dkt. 307), Defendants Activision Blizzard, Inc., Blizzard Entertainment, Inc., and Activision Publishing, Inc. (collectively, "Defendants" or "Activision") hereby provide their narrowing of invalidating prior art under 35 U.S.C. §§ 102 and 103 in view of Plaintiff Worlds, Inc.'s ("Plaintiff" or "Worlds") narrowing of asserted claims (Dkt. 336):

U.S. Patent No. 7,181,690	
1.	Air Warrior Game by Kesmai (1986)
2.	Michael Benedikt, "Cyberspace: Some Proposals," <i>Cyberspace: First Steps</i> (1991)
3.	DOOM Game by id Software (1993)
4.	Durward et al., U.S. Patent No. 5,659,691, titled "Virtual Reality Network with Selective Distribution and Updating of Data to Reduce Bandwidth Requirements," issued Aug. 19, 1997 (filed Sept. 23, 1993)
5.	Thomas A. Funkhouser, "RING: A Client-Server System for Multi-User Virtual Environments," 1995 IEEE Symposium on Interactive 3D Graphics, pp. 85-92, 209 (Apr. 9-12, 1995)
6.	Habitat System by Lucasfilm (1986) ( <i>e.g.</i> , Habitat, Club Caribe)

7.	Rick Kazman, "Making WAVES: On the Design of Architecture for Low-end Distributed Virtual Environments," Proceedings of IEEE Virtual Reality Annual International Symposium, pp. 443-449 (Sept. 18-22, 1993)
<b>U.S. Patent No. 7,943,558</b>	
1.	Air Warrior Game by Kesmai (1986)
2.	Michael Benedikt, "Cyberspace: Some Proposals," <i>Cyberspace: First Steps</i> (1991)
3.	DOOM Game by id Software (1993)
4.	Durward et al., U.S. Patent No. 5,659,691, titled "Virtual Reality Network with Selective Distribution and Updating of Data to Reduce Bandwidth Requirements," issued Aug. 19, 1997 (filed Sept. 23, 1993)
5.	Thomas A. Funkhouser, "RING: A Client-Server System for Multi-User Virtual Environments," 1995 IEEE Symposium on Interactive 3D Graphics, pp. 85-92, 209 (Apr. 9-12, 1995)
6.	Habitat System by Lucasfilm (1986) ( <i>e.g.</i> , Habitat, Club Caribe)
7.	Rick Kazman, "Making WAVES: On the Design of Architecture for Low-end Distributed Virtual Environments," Proceedings of IEEE Virtual Reality Annual International Symposium, pp. 443-449 (Sept. 18-22, 1993)
<b>U.S. Patent No. 8,082,501</b>	
1.	Air Warrior Game by Kesmai (1986)
2.	Michael Benedikt, "Cyberspace: Some Proposals," <i>Cyberspace: First Steps</i> (1991)
3.	DOOM Game by id Software (1993)
4.	Thomas A. Funkhouser, "RING: A Client-Server System for Multi-User Virtual Environments," 1995 IEEE Symposium on Interactive 3D Graphics, pp. 85-92, 209 (Apr. 9-12, 1995)
5.	Habitat System by Lucasfilm (1986) ( <i>e.g.</i> , Habitat, Club Caribe)
6.	Sitrick, U.S. Patent No. 4,521,014, titled "Video Game Including User Visual Image," issued June 4, 1985
7.	Wexelblat, U.S. Patent No. 5,021,976, titled "Method and System for Generating Dynamic, Interactive Visual Representations of Information Structures Within a Computer," issued June 4, 1991
<b>U.S. Patent No. 8,145,998</b>	
1.	Air Warrior Game by Kesmai (1986)
2.	Michael Benedikt, "Cyberspace: Some Proposals," <i>Cyberspace: First Steps</i> (1991)
3.	DOOM Game by id Software (1993)

4.	Thomas A. Funkhouser, "RING: A Client-Server System for Multi-User Virtual Environments," 1995 IEEE Symposium on Interactive 3D Graphics, pp. 85-92, 209 (Apr. 9-12, 1995)
5.	Habitat System by Lucasfilm (1986) ( <i>e.g.</i> , Habitat, Club Caribe)
6.	Marathon by Bungie Software Products (Dec. 1994)

Defendants reserve the right to rely on other prior art for other purposes, such as the state of the art and secondary considerations of non-obviousness.

Defendants reserve all rights with respect to the prior art that is being withdrawn as invalidating prior art under 35 U.S.C. §§ 102 and 103, including the right to modify this narrowed list of prior art as permitted by the Court and/or in response to any change in the scope of the asserted claims by Plaintiff. Nothing in this notice should be interpreted as an admission and/or concession by Defendants regarding any of Defendants' positions in this litigation, including but not limited to Defendants' assertion that the prior art being withdrawn as invalidating prior art under 35 U.S.C. §§ 102 and 103 invalidates the asserted claims. Moreover, nothing in this notice should be interpreted as an admission or concession that Defendants agree with Plaintiff regarding either the scope of any of the asserted claims under Plaintiff's apparent infringement theories and/or that any of Defendants' accused products meet any limitations of the asserted claims.

Dated: March 11, 2021

By: /s/ Sonal N. Mehta  
Sonal N. Mehta (*pro hac vice*)  
Sonal.Mehta@wilmerhale.com  
WILMER CUTLER PICKERING HALE AND  
DORR LLP  
2600 El Camino Real  
Suite 400  
Palo Alto, CA 94306  
Tel.: (650) 858-6000  
Fax: (650) 858-6100

Kevin S. Prussia (BBO# 666813)  
Kevin.Prussia@wilmerhale.com  
Claire M. Specht (BBO# 687952)  
Claire.Specht@wilmerhale.com  
Scott Bertulli (BBO# 690958)  
Scott.Bertulli@wilmerhale.com  
WILMER CUTLER PICKERING HALE AND  
DORR LLP  
60 State Street  
Boston, MA 02109  
Tel.: (617) 526-6000  
Fax: (617) 526-5000

*Attorneys for Defendants Activision Blizzard,  
Inc., Blizzard Entertainment, Inc., and  
Activision Publishing, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon the attorneys of record for Worlds, Inc. by email on March 11, 2021.

By: /s/ Lanta M. Chase